

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND

FILED
LOGGED
ENTERED
RECEIVED
SEP 23 2022
CLERK U.S. DISTRICT COURT
DEPUTY

JOSEPH R. JOHNSON, JR. a/k/a JOE
JOHNSON a/k/a JOE JOHNSON, JR.,

Plaintiff,

v.

AARON GREENSPAN, erroneously sued as
THINK COMPUTER CORPORATION,

Defendant.

Case No.

22-cv-2422-TJS

NOTICE OF REMOVAL

Pursuant to 28 U.S.C. §§ 1332, 1367, 1441, 1446, and Local Rule 103.5, Defendant Aaron Greenspan files this Notice of Removal and states as follows:

1. Aaron Greenspan, erroneously sued as Think Computer Corporation, is a defendant in Case Number CAL22-21998 filed in the Circuit Court of Maryland for Prince George's County.

2. This action began when Plaintiff filed a civil action on June 15, 2022 in the District Court for Prince George's County, Maryland against "Think Computer Corporation" with instructions to serve "AARON JACOB GREENSPAN" (the "Civil Action"). The Civil Action was assigned Case No. 050200123222022.

3. Neither Think Computer Corporation nor Aaron Greenspan were ever served with the District Court summons or complaint.

4. Upon information and belief, on or about July 20, 2022, the Civil Action was transferred to the Circuit Court for Prince George's County and assigned Case No. CAL22-21998.

5. Aaron Greenspan was served with a summons and complaint in the Civil Action on September 6, 2022 via First Class Mail (the "Circuit Court Complaint"). A copy of the Circuit Court Complaint is attached hereto as Exhibit A. The Circuit Court Complaint, which contains no facts at all, let alone any that would suggest a cause of action against Think Computer Corporation, did not contain any causes of action alleging federal questions and alleged compensatory damages of \$25,000 plus general, special, and punitive damages, as well as costs and reasonable attorney fees.

6. At the present time, at the commencement of the Civil Action in the District Court for Prince George's County, Maryland, and at the time of the filing of the Circuit Court Complaint in the Circuit Court for Prince George's County, Maryland, Plaintiff is and was an individual citizen of the State of Maryland.

7. At the present time, at the commencement of the Civil Action in the District Court for Prince George's County, Maryland, and at the time of the filing of the Circuit Court Complaint in the Circuit Court for Prince George's County, Maryland, Aaron Greenspan is and was an individual citizen of the State of California.

8. As set forth in the Circuit Court Complaint, Plaintiff seeks between \$100,000.00 and over \$275,000.00 in compensatory damages, based on Plaintiff's request for actual, statutory, and punitive damages, as well as other relief, in his claim against Defendant. Consequently, the amount in controversy in the Circuit Court Complaint exceeds the sum of \$75,000.00, exclusive of interest and costs.

9. Accordingly, this Court has original jurisdiction over the above-captioned action pursuant to 28 U.S.C. § 1332, as there is complete diversity among all parties, and the amount in controversy exceeds \$75,000.00. Thus, the above-captioned action may be removed pursuant to 28 U.S.C. § 1441(b).

10. Additionally, pursuant to 28 U.S.C. § 1367, this Court has supplemental jurisdiction over Plaintiff's state law claims.

11. The following process, pleadings, documents and orders were served upon Aaron Greenspan in the actions filed in the Circuit Court for Prince George's County, Maryland:

- Notice of Transfer to the Circuit Court for Prince George's County dated July 20, 2022 and mailed July 26, 2022, attached hereto as Exhibit A;
- Plaintiff's Complaint and Summons filed in the Circuit Court for Prince George's County on August 15, 2022, attached hereto as Exhibit B.

12. Within 30 days after filing this Notice of Removal, Aaron Greenspan shall file true and legible copies of all other documents file in state court in accordance with Local Rule 103.5a.

13. This Notice of Removal will be filed promptly in the Civil Action and be served upon Plaintiff.

WHEREFORE, Aaron Greenspan removes the subject action from the Circuit Court for Prince George's County to this United States District Court for the District of Maryland.

Dated: September 20, 2022

Respectfully submitted,


Aaron Greenspan
956 Carolina Street
San Francisco, CA 94107-3337
Phone: +1 415 670 9350
Fax +1 415 373 3959
E-Mail: aaron.greenspan@plainsite.org

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing Notice of Removal and Civil Cover Sheet was served by First Class Mail, postage prepaid, on September 20, 2022 to:

Joseph R. Johnson, Jr.
P.O. Box 441572
Fort Washington, MD 20749
Pro Se Plaintiff


Aaron Greenspan